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DEPARTMENT OF THE TREASURY
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FEDERAL COMMUNICATIONS COMMISSION
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The Honorable Reed Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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Dear Chairman Hundt:

I am writing as Chairperson of the Government Information Technology Services (GITS) Working Group, which has been charged with implementing the recommendations of an accompanying report to the Vice President's National Performance Review (NPR) "Reengineering Through Information Technology". That report recognized inefficiencies in the use of spectrum resources and recommended major improvements in interoperability and coordination at all levels of government.

As the Federal Communications Commission (FCC) nears final decision on ~~the proposed rulemaking~~ concerning the refarming and narrowbanding of frequencies below 512 MHz, I would like to offer comments on the potential impact of the Commission's decision on several public safety interoperability initiatives at the federal, state and local level.

The Federal Government is required to reduce the channel bandwidth for systems operating in the 162-174 MHz band to 12.5 kHz as the result of the National Telecommunications and Information Administration's (NTIA) approval of recommendations from the Interdepartment Radio Advisory Committee (IRAC) in May, 1992. Additionally, the IRAC has approved and forwarded recommendations to the NTIA to require all systems operating in the 406.1-420 MHz band to reduce the channel bandwidth from 25 kHz to 12.5 kHz. It has further requested an Ad Hoc Group to develop a narrowband channeling plan for the 138-150.8 MHz band utilizing a 12.5 kHz channel bandwidth. The NTIA has recently reaffirmed its commitment to support 12.5 kHz channel bandwidth in a letter to the IRAC.

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List A B C D E

Numerous representatives of the federal law enforcement community and other federal organizations have been working within the Association of Public Safety Communications Officials-International, Inc. (APCO) and the National Association of State Telecommunications Directors (NASTD) Project 25 for over five years to develop narrowband interoperability standards based on 12.5 kHz channel bandwidth. The goals of Project 25 are improved spectral efficiency, forward and backward compatibility, common air interface (interoperability), graceful migration affordable for the user community, and competition among manufacturers. These standards, which have been developed in close coordination of both manufacturers and users, will provide a level of communications interoperability within the public safety community that has never before been experienced.

The FCC's original proposal for narrowbanding in its land mobile refarming proceeding (PR Docket No. 92-235) would require users to migrate to 12.5 kHz channel spacing, then to a narrower channel bandwidth of 6.25 or 5 kHz as technology permits and systems became available. This plan, which is consistent with the NTIA channel plan and is the basis of the APCO Project 25 process, would greatly facilitate interoperability among federal, state and local public safety users operating in adjacent bands with a 12.5 kHz bandwidth.

It is now my understanding, however, that the Commission is currently considering a proposal, or proposals, that would in effect shorten the time period for type acceptance of equipment operating on 12.5 kHz channels, moving almost immediately to type accepting only equipment which would operate on 6.25 kHz channel spacing.

The concern of the federal user community is that this requirement will cause manufacturers to shift attention to the narrower bandwidth prematurely and without adequate consideration of communications interoperability. It is the feeling of the user agencies that little equipment would be available utilizing the 12.5 kHz channel bandwidth, and follow-on R&D efforts to provide new features and upgraded capabilities would be non-existent. This would in effect eliminate competitive markets and increase costs to the user, which directly impacts the taxpaying public. There is also some doubt among users whether manufacturers can provide backward compatibility from 6.25 kHz to the current 25 kHz systems.

There are several public safety interoperability initiatives at the federal and local government level which could also be impacted by the Commission's decision. One such initiative is the National Performance Review (NPR) Initiative IT04, which establishes the groundwork to develop a national wireless law enforcement network to be utilized by public safety and disaster response units at all levels of government. This network would be available to federal, state and local public safety communities in joint operations or as required in times of natural disaster or emergency. This network is envisioned to eventually provide a single wireless infrastructure that would support all federal, state and local law enforcement and public safety needs.

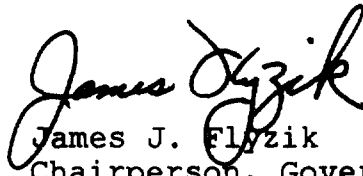
Another initiative impacted is the National Security/Emergency Preparedness Telecommunications J-10 Initiative, sponsored by the National Communications System, to improve telecommunications interoperability among federal, state and local government organizations. There are a number of state and regional projects underway that are focused on joint-use of telecommunications systems to improve interoperability and provide more efficient service, including spectral efficiency. These activities include the development of statewide wireless systems with interstate connectivity for use by federal, state and local public safety entities.

The initiatives that have been discussed are currently underway or being planned to improve communications interoperability while improving spectral efficiency. As such, they are highly dependent on the successful adoption of common standards, like those developed by APCO Project 25, and common channel widths.

I urge the FCC to adopt, as has the NTIA, the 12.5 kHz channel spacing immediately and phase in the use of systems utilizing 6.25 kHz channel widths as they become available. Further, I urge that 6.25 kHz channel spacing not be adopted as a replacement for at least a ten year period. This policy, as proposed by APCO and others, offers a viable solution that will

facilitate the introduction of narrowband digital technology to public safety communications while not causing an undue burden on budgets and ultimately, the taxpayers. I feel that this phased approach is essential to accomplish the interoperability and common sharing goals of the public safety community, as well as to maintain U.S. manufacturing competitiveness in the international marketplace.

Sincerely,



James J. Flyzik
Chairperson, Government Information
Technology Services (GITS)

cc: Commissioner James H. Quello
Commissioner Andrew C. Barrett
Commissioner Rachelle B. Chong
Commissioner Susan Ness
Regina M. Keeney, Wireless Telecommunications Bureau
Larry Irving, U.S. Department of Commerce
Richard D. Parlow, National Telecommunications and
Information Administration
Federal Law Enforcement Wireless Users Group